DEPARTMENT OF PESTICIDE REGULATION
FUNCTIONAL OPERATION PLAN
2007/2008

Pesticide Registration

Pesticide registration is the scientific, legal, and administrative evaluation process of a pesticide product before it can be sold or used in California. The registration process also includes special registration activities such as reviewing and issuing research authorizations; reviewing and issuing emergency exemption Section 18 products; reviewing and registering structural pest control devices; and consulting with the U.S. Environmental Protection Agency (U.S. EPA) on federal registration issues.

Performance Goal 1: Process 7,000 actions on submissions.

1. Reach a registration decision on approximately 15 new active ingredients (depending on the number of new active ingredients received) within an average of one year of submission of a complete evaluation package.
2. Reach a registration decision on products containing currently registered active ingredients within an average of six months of submission of a complete package.
3. Evaluate 15 Section 18 requests.
4. Evaluate 500 research authorizations.
5. Evaluate 25 Special Local Needs.

Performance Goal 2: Complete the license renewal of approximately 11,300 pesticide products by February 1, 2008.

Performance Goal 3: Reduce workload and increase efficiency.

1. Evaluate, develop, and implement stakeholder outreach programs. Initiate the development of training programs and communication strategies by June 2008.
2. Track and report workload changes in the data evaluation process due to the implementation of Food and Agricultural Code Section 12811.5 (AB 1011).
3. Participate in the Accepted Labels State Tracking and Repository e-labeling pilot project developed by the National Pesticide Information Retrieval System at Purdue University to examine the feasibility of receiving and making available electronic pesticide product labels. Report on pilot project accomplishments.

Performance Goal 4: Continue to develop work share programs with U.S. EPA.

Risk Assessment

Risk assessment is a process designed to answer questions about a chemical's toxicity, what exposure results from its various uses, what the probability is that it will cause harm, and how to characterize the risk. Risk assessment can be broken down into four steps: (1) hazard identification; (2) dose-response assessment; (3) exposure assessment; and (4) risk characterization. DPR takes a comprehensive approach to risk assessment and assesses potential dietary, workplace, residential, and school areas, and ambient air exposures. Risk assessment is often the driving force behind new regulations and other

use restrictions. Risk assessment also includes special toxicology review activities, such as reviewing emergency determinations of potential human impacts resulting from illegal residues of pesticides on agricultural commodities, and coordinating Proposition 65 activities with the Office of Environmental Health Hazard Assessment (OEHHA).

Performance Goal 1: Complete six risk assessments under SB950, AB2161 or AB1807 during the fiscal year 2007-08.

Performance Goal 2: Annually publish prioritization list for comprehensive risk assessments and initiate assessments according to DPR's risk assessment prioritization and initiation process.

Licensing and Certification

Licensing and Certification ensures that licensed individuals are competent and knowledgeable in selling, possessing, storing, handling, applying, and recommending the use of pesticides. DPR examines and licenses commercial pest control applicators, aerial applicators, pest control dealer designated agents, and pest control advisers, and certifies pesticide applicators that use or supervise the use of restricted pesticides. These license and certificate holders are required to complete continuing education hours related to pesticides and pest management in order to renew. This requirement provides the license and certificate holders with updates in pesticide laws and regulations, new pest control application technology, and pest management techniques. Licensing and Certification also licenses pest control businesses, maintenance gardener pest control businesses, pesticide brokers, and pest control dealers.

Performance Goal 1: Administer the Licensing and Certification Program.

1. Process approximately 13,000 license and certificate applications (new and renewals).
2. Administer approximately 7,000 exams.
3. Re-notice the rulemaking amendment addressing the minimum qualifications for new pest control advisers by December 2007.
4. Accredit approximately 1,700 continuing education courses and audit approximately 8-10 courses.
5. Implement the revised laws and regulations examination by December 2007.
6. Finalize the new maintenance gardener pest control study guide and examination question pool by January 2008.
7. Implement the new software for the licensing and certification database migration project by September 2007.
8. Work with the University of California, Integrated Pest Management (UCIPM) Program to provide ongoing cooperative services in accordance with a multi-year interagency agreement. Staff will help UCIPM develop priorities for the 2008/09

fiscal year related to licensing and certification study guides and examinations by June 2008.
9. Work with UCIPM to develop the new field fumigation study guide and examination by December 2008.
10. Notice the rulemaking amendment to add the Field Fumigation subcategory to the Residential, Industrial and Institutional category for the qualified applicator license and certificate by June 2008.
11. Notice the rulemaking amendment to add the Maintenance Gardener subcategory to the Landscape Maintenance category for the qualified applicator certificate by June 2008.

Permitting and Pesticide Use Reporting

Permitting is an ongoing program to assess, evaluate, and mitigate the use of restricted materials (California Environmental Quality Act equivalency). Pesticide use reporting is an ongoing program to collect and process data on full use reporting of agricultural and structural pesticide applications, per the Food Safety Act of 1989 (Chapter 1200, AB 2161). Under full use reporting, certain agricultural pesticide uses are required to be reported to the county agricultural commissioner (CAC), who, in turn, reports the data to DPR. DPR also collects reports from structural pest control businesses for pesticide use in schools. Full use reports include the amount and name of the pesticide applied, date and location (section, township, range) of the application, and, if the application was agricultural, the crop. The primary exceptions to the use reporting requirements are home and garden use, and most industrial and institutional use. The pesticide use reports are compiled by DPR and made available on disc and on DPR's Web site. DPR also provides support to the CACs on their administration of the computer systems and applications for the Restricted Material Permit Program, which is used to manage, track, and collect data for permits, operator identifications, and pesticide use reports.

Performance Goal 1: Administer the statewide permitting and pesticide use reporting programs.

1. In November 2007, publish the 2006 Annual Pesticide Use Report, including major categories.
2. Support the ongoing collection, validation, and editing of pesticide use data for the pesticide use reporting program.
3. Support changes to pesticide use report process as required by the new regulations designed to reduce emissions from volatile organic compounds.

Monitoring/Surveillance (Continuous Evaluation)

Monitoring/surveillance is an ongoing process to determine the fate of pesticides, protecting the public and the environment from pesticide contamination through analyzing hazards, and developing pollution prevention strategies. Monitoring/ surveillance program activities include ground water monitoring, surface water monitoring, air quality monitoring, pesticide illness surveillance, produce surveillance, and special monitoring programs such as pest management and eradication, environmental fate, and human exposure monitoring projects. The monitoring of pesticide residues in food is also a major component of the monitoring/surveillance activities.

Performance Goal 1: Monitor pesticide residues in food.

1. State residue monitoring: Collect over 3,000 samples.
2. Pesticide Data Program: Collect over 2500 samples.
3. Microbiological Data Program: Collect 850 samples.
4. Compile 2007 Annual Residue Summary: Post to Web site by June 2008.

Performance Goal 2: Evaluate pesticides in air.

1. Update inventory of volatile organic compound (VOC) emissions from pesticides.
2. Evaluate 40 pesticides and other environmental contaminants in the rural, farming community of Parlier. Finalize report by end of 2008.
3. Pursuant to the Toxic Air Contaminant Act, evaluate six pesticides as potential environmental contaminants (acrolein, sodium tetrathiocarbonate, chloropicrin, , methomyl, phosphine, and endosulfan).

Performance Goal 3: Evaluate pesticides in ground water.

1. Evaluate and investigate the potential for tebuthiuron, a pesticide not previously detected, to migrate to California's ground water.
2. Investigate detections of pesticides on the 6800(a) list (atrazine, simazine, bromacil, diuron, prometon, bentazon, and norflurazon) that occur outside of currently regulated areas.
3. Conduct field studies and modeling exercises to improve the ability of the Leaching Evaluation and Chemistry Model to predict pesticide fate in California and compare accuracy to other models using field data.
4. Produce annual report of pesticides sampled for and found in ground water and the actions taken by DPR and the SWRCB to prevent further gound water contamination.

Performance Goal 4: Evaluate pesticides in surface water.

1. Evaluate 26 pesticides as potential environmental contaminants in urban and agricultural areas. Pesticides include organophosphates, carbamates, triazines, dinitroanalines, thiram, pyrethroids, and other herbicides.
2. Produce annual update of the surface water database.

3. Produce mathematical models for vulnerable areas to runoff and mitigation assessment.

Performance Goal 5: Evaluate Human Exposures to Pesticides.

1. Occupational Exposures:
   a. Initiate one new worker exposure monitoring study.
   b. Develop a draft report of the dermal exposure monitoring of 30 cotton and tomato irrigators to oxamyl residues.
   c. Initiate a study on dislodgeable foliar residue and deposition comparison of spray equipment designed to reduce the use of pesticides vs. conventional sprayers.
   d. Complete the report for the observation study of applicator exposure to dust formulations.
2. Pesticide Illness Surveillance Program (PISP):
   a. Complete 1,200 pesticide episode case reviews and evaluations, and prepare the 2006 annual report of pesticide-related illnesses and injuries.
   b. Provide consultation to 100 stakeholders on pesticide-related health and exposure inquiries and respond to 100 query requests of the PISP database.
   c. Complete a report of one scientific evaluation of PISP and other data from 1994-2004 for applicators using hand-held equipment.
   d. Conduct an evaluation of PISP and other data from 1994-2004 to determine the reasons for violations of personal protective equipment requirements found during pesticide-related illness investigations, and complete a draft report.
   e. Through the U.S. EPA Border 2012 Project assist the Mexico's health department set up a pesticide illness surveillance program.

Mitigation of Human Health Risks

Mitigation of human health risks involve developing mitigation strategies and proposals based on scientific data for pesticides that have unacceptable risks to humans associated with exposure. These may include unacceptable pesticide exposure in air, the workplace, and in food and water. Mitigation measures may include developing proposed label changes, regulations (includes rulemaking process), and placing conditions on registration. As part of the mitigation development process, efforts are placed on obtaining and providing input on mitigation proposals from both internal and external stakeholders, responding to their comments, conducting a peer review of mitigation documents, and finalizing documents for release to the public.

Performance Goal 1: Implement Mitigation Measures for Specific Pesticides.

1. Complete the mitigation process for methyl parathion, and naled; continue development of mitigation strategies for amitraz, atrazine, deltamethrin and trahalomethrin; and initiate the development of mitigation strategies for methamidophos and methidathion.

Performance Goal 2: Worker Risk.

1. Continue the development of two rulemaking actions (closed systems and hand and eye protection).
2. Focus training and outreach efforts.
    a. Participate in 15 outreach sessions with health professionals, worker advocates, commodity groups and government agencies to address worker protection and public health issues.
    b. Provide 10 training sessions on personal protective equipment, including the revised respiratory protection regulations, and industrial hygiene.
    c. Provide two training sessions to emergency responders on handling pesticide-related incidents.
    d. Complete a draft PSIS leaflet for use as training material that focuses on hazards, routes, symptoms and sources of pesticide exposure. Complete an evaluation of agricultural fieldworker training requirements, outreach materials, assessments of fieldworker training needs and other sources of information prior to the development of the PSIS leaflet.
    e. Work with the community clinics in San Diego and Sonoma Regions and explore contacts with Yuba, Butte, Sutter, Glenn and Imperial Counties to provide outreach on pesticide safety, discuss physician-reporting requirements, and distribute copies of Recognition and Management of Pesticide Poisonings. Coordinate with MiVia to conduct physician training at clinics. Coordinate these outreach efforts with OEHHA and other agencies.
3. In coordination with the California Agricultural Commissioners and Sealers Association and the Department of Industrial Relations, negotiate changes to the existing memorandum of understanding.
4. Continue working with OEHHA and pilot counties (Fresno, Monterey, San Diego) in developing a web-based physician reporting system.
5. Provide Spanish translation of outreach documents and worker safety presentations for approximately 10 documents related to environmental justice projects, community right to know issues, training, and health and safety.
6. Prepare and implement a work plan to address the recommendations developed during the review of illnesses following structural applications (HS-1854).

Performance Goal 3: Mitigating Community Risk.

1. Air Initiative - Implement VOC emission reduction regulations for fumigants (metam-sodium/MITC-generating pesticides, methyl bromide, 1,3-dichloropropene, chloropicrin and sodium tetrathiocarbonate).
2. Air Initiative – Revise and update, in cooperation withthe Air Resources Board, the State Implementation Plan under the Clean Air Act, a commitment to reduce agricultural and commercial structure pesticide VOC emissions.

Mitigation of Environmental Hazards

Mitigation of environmental hazards is the process of developing strategies and proposals based on scientific data to reduce and lower the risks for pesticides that have unacceptable risks to the environment (including endangered species and phytotoxic residues) from contaminants in ground water, surface water, and air. As part of the mitigation development process, efforts are placed on obtaining and providing input on mitigation proposals from both internal and external stakeholders, responding to their comments, conducting a peer review of mitigation documents, and finalizing documents for release to the public.

Performance Goal 1: Mitigation pesticides impacts on ground water.

1. Evaluate the effectiveness of chemigation in mitigating the movement of pesticide to ground water by measuring the environmental fate and behavior of pesticides applied through micro sprinkler irrigation systems in a vulnerable California soil.
2. Mitigate the impacts of pesticides detected in California's ground water by evaluating the effectiveness of current management practices through monitoring an established network of shallow wells in Fresno and Tulare counties
3. Evaluate current chemigation and backflow prevention requirements to determine effectiveness; if necessary, propose regulatory changes or provide additional training to the regulated community.

Performance Goal 2: Mitigate pesticides impacts on surface water.

1. Identify and evaluate mitigation options for three pesticides adversely affecting the environment (diazinon, chlorpyrifos, and pyrethroids) in cooperation with the State Water Quality Control Board, the regional water quality control boards, and other stakeholders.
2. Develop and implement mitigation measures for copper-based antifouling paints.
3. Continue the re-evaluation process for diazinon, chlorpyrifos, pyrethroids, and antifouling paints.

Performance Goal 3: Nontarget and endangered species protection.

1. Endangered species:
    a. Support statewide permitting, use reporting, and geographic information systems by maintaining the Pesticide Regulations Endangered Species Custom Real-time Internet Bulletin Engine (PRESCRIBE) online database application, updates to the Endangered Species Program Web site, and ongoing support for PRESCRIBE custom bulletins.
    b. Disseminate information pertinent to court-ordered pesticide use buffers for the protection of Salmonids in California.

   c. Disseminate information pertinent to the stipulated injunction for the protection of California Red-legged Frog.
   d. Develop new or revised outreach material for 3 to 6 endangered species. In the next six months, we expect to develop artwork and information for 16 endangered plant species.
   e. Translate existing applicator training materials for endangered species identification to Spanish. Translation of materials is ongoing. Over the past six months, we have translated materials for 16 species. In the next six months, we expect to translate materials for 16 species. 20,000 sets of endangered species cards in Spanish will be printed for distribution to counties, applicators, and industry groups.
2. Consult with the U.S. Fish and Wildlife Service on protection measures for California Red-Legged Frog.
3. Consult with California Department of Fish and Game on security needs in PRESCRIBE to protect endangered species.

Pest Management Programs

Pest management programs include school Integrated Pest Management (IPM), agricultural and urban pest management projects on high priority pesticides, IPM innovator awards, technical/scientific resource services, and outreach to stakeholders.

Performance Goal 1: School IPM: Prevent children's exposure to pesticides by facilitating adoption of IPM in schools.

1. Conduct 4 planned school IPM workshops to instruct school district staff on techniques to control pests while reducing risks by June 2007.
2. Conduct outreach and education:
   a. Maintain Web site information on an ongoing basis.
   b. Distribute 4 interactive learning modules on pests and IPM.
   c. Publish a seasonal calendar of IPM activities and a poster to be released Spring 2008.
3. Respond to approximately 250 inquiries from schools and the public on an ongoing basis.
4. Prepare and give 8-10 seminars and 2-3 publications on school IPM.
5. Conduct and analyze the 2007 School IPM Survey statewide.

Performance Goal 2: School and Child Day Care IPM: Implement the Child Day Care IPM provisions as mandated by Assembly Bill 2865 (Chapter 865, Statutes of 2006).

1. Hire and train new staff.
2. Meet with stakeholders and prepare communications.
3. Prepare IPM train-the-trainer program for child day care facilities.
4. Answer inquiries from the public on an ongoing basis.

Performance Goal 3: Promote pollution prevention.

1. Protect water quality by
   a. Continuing the Food Quality Protection Act grant to demonstrate organophosphate alternatives in stone fruit production.
   b. Monitoring pyrethroid transport in the San Joaquin River watershed (SWRCB) by March 2009.
   c. Assessing economic and environmental measures associated with pheromone use on codling moths in walnuts by March 2008.
2. Recommend IPM Innovator Award recipients in July 2007, and conduct award ceremony in January 2008.
3. Environmental Justice Pilot Project in Parlier - Analyze pest management trends and practices that reduce pesticide risk. Staff will make a presentation to PMAC by May 2007, and compile a final report by October 2007.
4. Air Quality Initiative - Identify and promote innovative technologies that reduce pesticide use and risk.
5. Urban Pest Management Working Group - Meet with various public agency, UC, CSU, and private industry people on a monthly basis to make recommendations to PMAC on urban IPM priorities in February 2008.
6. Support IPM in retail stores - Finalized a settlement with Walgreens that directs them to work with the Our Water, Our World (OWOW) program to carry pest control products that support IPM and best management practices. Continue to work with OWOW to inform Walgreens.
7. Support the Natural Resource Conservation Service in promoting the use of Farm Bill money for IPM. First meeting is to occur by June 2007.
8. Lead coordination on priorities and leverage resources with UC, CSU, Western Regional IPM Center, CDFA, etc. Identified scientific staff role to convene these sessions using a cross-media approach.
9. Pest Management Alliance Grant Program - Solicitation package to be completed by the end of June 2007.

Performance Goal 4: Implement the Alliance Grant Program.

1. Post the grant solicitation package to DPR's Web site July 2007.
2. Hire and train new staff.
3. Award three to four grants in the 2007/08 fiscal year.
4. Plan for the next grant cycle in 2007/08; disburse second year funds in 2008/09.

Enforcement

Enforcement activities include establishing statewide enforcement priorities, overseeing CAC's pesticide use enforcement activities, conducting investigations, and taking enforcement action. Statewide enforcement guidance includes identifying priorities and

developing a prioritization plan of performance objectives and strategies; negotiating enforcement work plans with each CAC; preparing an evaluation on the effectiveness of the county program; and consulting with CACs on the pesticide enforcement program, including investigations, researching and analyzing various compliance trends, and advising CACs of DPR policies, procedures, and developing issues. Enforcement activities include determining if an administrative civil penalty is required and sending a Notice of Proposed Action to a respondent; upon request, conducting a hearing with the respondent; preparing findings of fact, Notice of Final Decisions, and Director's Order; signing Notice of Final Decision and Order; providing appeal procedures to the respondent; and levying a civil penalty if respondent's appeal does not lead to a reversal of the decision.

Performance Goal 1: Oversee the county pesticide use enforcement program.

1. Implement the County Regulatory Oversight Program:
   a. Maintain and revise the CACs performance review and work plan timetable.
   b. Complete the CAC 2006/07 performance evaluations.
   c. Post the 2006/07 and 2007/08 county work plans on DPR's Web site. Post the 2006/07 county performance evaluations on DPR's Web site.
2. Maintain the County Oversight Inspection Program:
   a. Conduct 100 county oversight inspections, both risk-based and neutral scheme.
      i. Target oversight inspections by focusing on specific industry (growers, packing houses, and commodity groups), chemical groups (fumigants), equipment-uses (sprinkler applications), work activities, and/or repeat violators.
      ii. Conduct repeat-violator inspections based on Enforcement Action Database. Analyze CAC inspection programs using information gathered through the County Oversight Inspection Program and the Inspection Tracking Database to identify and focus on common violation trends to use in field monitoring.
   b. Analyze DPR's oversight and follow-up inspections to identify inspection efficiencies and measure program progress.
   c. Administer the Pesticide Regulatory Activities Monthly Report, including data input, quarterly reports, and draft of final report to CACs by October 2006. Finalize report by February 2007.
   d. Work with CACs to identify data needed to support program.
   e. Coordinate with the CAC subcommittee to analyze the Pesticide Regulatory Activities Monthly Report and use an activities-reporting form to measure performance.

Performance Goal 2: Compliance monitoring.

1. Conduct inspections in conjunction with the U.S.EPA Cooperative Agreement.
   a. Conduct Pesticide Producing Establishment Inspections (45).
   b. Conduct County Oversight Inspections.

i. Certified Applicators/Pesticide Dealers (10).
ii. Agricultural Use and Follow-up Inspections (150).
iii. Nonagricultural Use and Follow-up Inspections (30).
iv. Worker Protection Standard Tier 1 Inspections (30).
v. Miscellaneous Inspections (10).

c. Collect and analyze pesticide product samples in conjunction with the U.S.EPA Cooperative Agreement (40).

2. Conduct 400 Product Compliance Inspections (130 federal and 270 state).
3. Improve quality of Pesticide Episode Investigations including human illness and environmental impacts with special emphasis on Priority Investigations to address the use of restricted materials that result in a priority episode.

Performance Goal 3: Enforcement response.

1. Evaluate data to identify persons with repeat violations for possible state actions.
2. Administrative Hearings Program – Complete outreach materials revisions (regulatory toolbox and Administrative Hearing Guides) for CAC staff and management acting as county advocates or hearing officers.
3. Review Enforcement Response regulations to determine if amendments needed.

Performance Goal 4: State and County regulator training.

1. Continue the Enforcement Branch Liaison Internal Forum.
2. Conduct training sessions for CAC staff statewide in the following topics:
   a. Structural pest control training by June 2008.
   b. Inspection procedures training to be conducted at multiple locations throughout the state upon completion of the revised Inspection Procedures Manual.
   c. Hearings and advocacy training for CAC staff.

Performance Goal 5: Special projects.

1. Continue development of the Pesticide Use Enforcement Program Standards Compedium and assign project lead for maintenance of each volume.
   a. Volume 1 – General enforcement information and other related programs: In development.
   b. Volume 2 – Laws and Regulations: Completed; annual revisions as necessary.
   c. Volume 3 – Restricted Materials and Permit Management: Completed.
   d. Volume 4 – Inspection Procedures: Completed
   e. Volume 5 – Investigation Procedures: Completed.
   f. Volume 6 – Enforcement Guidelines: In development Spring 2007.
   g. Volume 7 – Hearings Sourcebook: Completed.
   h. Guidelines for interpreting pesticide laws and regulations.
2. Coordinate with Information Technology Branch to stabilize all Enforcement Branch databases, including Inspection Tracking database, to prepare for CACs use of Automating Reporting System.

3. Continue Border Coordinator activities with Mexico.
   a. Promote communication and provide training and coordination with border region agricultural officials, growers, and fieldworkers.
   b. Analyze residue data from produce to reduce shipments with illegal residues.
4. Explore development of a pesticide incident response team to include members.

Mill Assessment/Product Compliance

The focus of the mill assessment and product compliance program is to ensure products are registered prior to sales and use in California, that they are labeled correctly, and that the mill assessment fees have been paid. Mill assessment is a fee that California assesses on all pesticide sales, levied at the point of first sale into the State. A "mill" is equal to one-tenth of a cent. The mill assessment rate is established via regulation and is currently set at 21 mills, or 2.1 cents per dollar of sales. Of the 21 mills collected, 13.4 mills are allocated for State pesticide regulatory activities. This allotment represents approximately two-thirds of DPR's total funding. The remaining 7.6 mills are disbursed to the County Agricultural Commissioner (CAC) via criteria established in regulation as partial reimbursement for their pesticide use enforcement activities at the local level.

The mill assessment program is a self-assessment system. Each quarter, DPR mails reporting forms to pesticide registrants, licensed pest control dealers, and licensed pesticide brokers. Completed forms are due to DPR within 30 days of the end of the quarter. To ensure products in the channels of trade are registered and in compliance with state and federal pesticide labeling laws and regulations, and to verify the sellers are paying sufficient mill assessment, DPR staff conducts inspections and audits of registrants, dealers, brokers and retailers throughout the U.S. Sellers in violation of product compliance and/or mill assessment requirements are subject to civil penalties.

Performance Goal 1: Collect the mill assessment on a quarterly basis from the 1,800 registrants, dealers, and brokers.

Performance Goal 2: Ensure responsible parties pay legally sufficient mill assessment on sales and distribution of pesticides into or within California.

1. Conduct 40 registrant audits.
2. Conduct 20 broker/dealer audits.
3. Conduct 15 audits of non-licensed entities.
4. Continue evaluating product movement in the channels of trade to determine the responsible party is paying mill assessment and access level of compliance.

Performance Goal 3: Ensure pesticide products sold into or within California are registered and labeled correctly.

1. Coordinate with the Enforcement Branch to conduct 400 product compliance inspections. (U.S. EPA Cooperative Agreement – 130/State Program –270)

2. Coordinate, track and investigate 120 product related complaints.
3. Maintain and evaluate compliance history on company/firm(s) and products.
4. Develop policies and legislative or regulatory solutions to address inconsistencies and to promote equity within the regulated community.

Performance Goal 4: Pursue appropriate and consistent enforcement options and settlement agreements.

1. Coordinate with the Office of Legal Affairs (OLA) in pursuing enforcement actions on 150-200 cases of unregistered or misbranded products.
2. Post final dispositions for settlement agreements on external web site.

Performance Goal 5: Manage the disbursement of mill assessment funds to the county agricultural commissioners (CACs) on an annual basis.

1. Prepare quarterly mill assessment projections for CACs.
2. Coordinate and address funding issues with CACs.